

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

WANDA OVALLES, Individually and :  
P.P.A. ADRIAN OVALLES and :  
WILSON OVALLES :  
Plaintiffs :  
:  
vs. : C.A. No. 14-cv-00137-M-PAS  
:  
SONY ELECTRONICS INC.; BEST BUY :  
CO., INC.; FOXCONN INTERNATIONAL :  
INC.; and JOHN DOE :  
CORPORATIONS 1-4 :  
Defendants :

**DEFENDANT'S, FOXCONN INTERNATIONAL INC.,  
OBJECTION TO PLAINTIFFS' MOTION TO LIMIT DISCOVERY,  
FOR THE IMPOSITION OF SANCTIONS AND FOR EXPEDITED RELIEF**

Defendant, *Foxconn International Inc.*, hereby objects to Plaintiffs' motion to limit discovery, for imposition of sanctions and for expedited relief. Defendant relies upon the attached accompanying memorandum in support of its objection.

**FOXCONN INTERNATIONAL, INC.**

By its Attorneys,

/s/ Thomas C. Angelone

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Dated: February 16, 2017

**CERTIFICATION**

I hereby certify that, on the 16<sup>th</sup> day of February, 2017, I filed and served this document through the electronic filing system on the following parties:

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*/s/ Thomas C. Angelone*

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

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|----------------------------------|------------|----------------------------|
| WANDA OVALLES, Individually and  | :          |                            |
| P.P.A. ADRIAN OVALLES and        | :          |                            |
| WILSON OVALLES                   | :          |                            |
|                                  | Plaintiffs | :                          |
|                                  | :          |                            |
| vs.                              | :          | C.A. No. 14-cv-00137-M-PAS |
|                                  | :          |                            |
| SONY ELECTRONICS INC.; BEST BUY  | :          |                            |
| CO., INC.; FOXCONN INTERNATIONAL | :          |                            |
| INC.; and JOHN DOE               | :          |                            |
| CORPORATIONS 1-4                 | :          |                            |
|                                  | Defendants | :                          |

**DEFENDANT'S, FOXCONN INTERNATIONAL INC.,  
MEMORANDUM IN SUPPORT OF ITS OBJECTION TO PLAINTIFFS'  
MOTION TO LIMIT DISCOVERY, FOR THE IMPOSITION OF SANCTIONS  
AND FOR EXPEDITED RELIEF**

Plaintiffs want the Court to ignore the discovery closure date of March 3, 2017, which is set forth in the Scheduling Order of the Court entered December 19, 2016. The Scheduling Order does not limit what discovery may take place; it sets only a time limit for its completion. There is no rule that prohibits discovery from taking place at any time during the period set by such an order.

Plaintiffs filed a ten-page memorandum in support of their objection to discovery that occurs before – but too close to – the discovery finish line. Plaintiffs' arguments are without merit. If the Court wished to set the finish line earlier or otherwise limit the scope, it would have done so in the Scheduling Order. Moreover, if Plaintiffs were concerned about the period of time allotted by the Court, they should have moved to shorten the finish line, which they did not.

Plain and simply, Plaintiffs' motion should be denied.

**FOXCONN INTERNATIONAL, INC.**

By its Attorneys,

/s/ Thomas C. Angelone

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